

EXHIBIT 2

From: Michael Mitchell <mmitchell@bsfllp.com>
Sent: Thursday, August 5, 2021 9:08 AM
To: justin.bernick@hoganlovells.com; william.monts@hoganlovells.com; peter.walsh@hoganlovells.com; liam.phibbs@hoganlovells.com; olga.fleysh@hoganlovells.com; holden.steinbauer@hoganlovells.com; dlaytin@kirkland.com; ccottrell@kirkland.com; christina.sharkey@kirkland.com; adam.collins@kirkland.com; mjohnson@greenespel.com; nicholas.ruge@kirkland.com; amarto.bhattacharyya@kirkland.com; vanessa.barsanti@kirkland.com; max.samels@kirkland.com; jenna.stupar@kirkland.com; christina.briesacher@kirkland.com; Richard.Duncan@FaegreDrinker.com; Craig.Coleman@FaegreDrinker.com; Emily.Chow@FaegreDrinker.com; Isaac.Hall@FaegreDrinker.com; Stephanie.Koltookian@FaegreDrinker.com; aaron.vanoort@faegredrinker.com; bryan.washburn@faegredrinker.com; stephenneuwirth@quinnemanuel.com; michaelcarlinsky@quinnemanuel.com; samirashid@quinnemanuel.com; richardvagas@quinnemanuel.com; bobbyvance@quinnemanuel.com; davidadler@quinnemanuel.com; anaisberland@quinnemanuel.com; allison.silber@quinnemanuel.com; andrew.mollard@quinnemanuel.com; michaelguerrero@quinnemanuel.com; dheeman@spencerfane.com; jnelson@spencerfane.com; rwinter@spencerfane.com; amcclintic@spencerfane.com; william.greene@stinson.com; nicci.warr@stinson.com; peter.schwingler@stinson.com; zachary.hemenway@stinson.com; william.thompson@stinson.com; courtney.harrison@stinson.com; rparker@gibsondunn.com; jlifton@gibsondunn.com; probison@gibsondunn.com; rrobertson@gibsondunn.com; spearl@gibsondunn.com; PPatel@gibsondunn.com; jcotter@larkinhoffman.com; jkvinge@larkinhoffman.com; cfitzgerald@gibsondunn.com; rstone@gibsondunn.com; myu@gibsondunn.com; aaron.chapin@huschblackwell.com; gene.summerlin@huschblackwell.com; marnie.jensen@huschblackwell.com; ryann.glen@huschblackwell.com; kamron.hasan@huschblackwell.com; sierra.faler@huschblackwell.com; Tessa.Jacob@huschblackwell.com; Chris.Smith@huschblackwell.com; LegalSupportTeam-Law-OMA@huschblackwell.com; Adcox, Rachel J; Rider, Tiffany; Strang, Lindsey; Oppenheimer, Brooke J.; David Graham; Boxbaum, Brandon; Greathouse, Madeline A.; Taylor, Jarod G.; Leon, Daniel O.; Holleran, Keith J. Scott Gant; Eddy, David C.; Robert Kaplan; Matthew McCahill; Mandrika Moonsammy; Ryan Manion; Eric R. Lifvendahl; David B. Esau; Kristin A. Gore; Lynch, Dennis J.; Surratt, Gina Y.; Patrick Ahern; jonc@cuneolaw.com; bfinley@cuneolaw.com; kbates@hausfeld.com; jcbourne@locklaw.com; bdclark@locklaw.com
Cc:
Subject: FW: Discovery requests

Caution: External Email

Counsel for Defendants,

Now that the Protective Order has been entered in the Pork MDL Proceeding, the MDL DAPs request that the Defendants provide the following discovery materials from *In re Pork Antitrust Litigation*, Case No. 18cv1776 (the “*Pre-Existing Non-MDL Cases*”):

1. Defendants’ responses to the written discovery requests listed as Nos. 1-3 in the July 6 email below, i.e., (i) all class plaintiffs’ first set of RFPs to the pork-producing defendants; (ii) the IPP class plaintiffs’ separate RFPs to

the pork-producing defendants; and (iii) all class plaintiffs' first set of Interrogatories to the pork-producing defendants.

2. Defendants' Initial/Required Disclosures (and related materials) (per ECF No. 290).
3. Any additional written discovery served by plaintiffs on Defendants, and Defendants' responses to any such discovery.
4. All correspondence or other materials memorializing any agreements between the parties as to Defendants' responses to any written discovery, including related to: [1] search terms, [2] custodians, [3] non-custodial document /data sources, including structured data sources.
5. Any third party subpoenas in the *Pre-Existing Non-MDL Pork Cases*, responses to such subpoenas, and documents produced.
6. The search terms Defendants have already used to search for responsive documents in the *Pre-Existing Non-MDL Pork Cases*, and documents and structured data already produced (per the proposed CMO).

Thank you.

Michael S. Mitchell

Partner

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From: Robison, Brian E. <BRobison@gibsondunn.com>

Sent: Tuesday, July 6, 2021 1:55 PM

To: Scott Gant <sgant@bsflp.com>; Garth Yearick <gyearick@carltonfields.com>; Kristin A. Gore <kgore@carltonfields.com>; David B. Esau <desau@carltonfields.com>; Michael Mitchell <mmitchell@bsflp.com>; elifvendahl@lgcounsel.com; Ryan Manion <RManion@lgcounsel.com>; Robert Kaplan <RKaplan@kaplanfox.com>; Matthew McCahill <mmccahill@kaplanfox.com>; Jason Uris <juris@kaplanfox.com>; Richard Coffman <rcoffman@coffmanlawfirm.com>

Subject: Discovery requests

Dear New DAP Counsel:

I have attached the following discovery requests that you requested during our June 23 call:

1. All class plaintiffs' first set of RFPs to the pork-producing defendants
2. The IPP class plaintiffs' separate RFPs to the pork-producing defendants
3. All class plaintiffs' first set of Interrogatories to the pork-producing defendants
4. The defendants' first set of RFPs to the DPPs
5. The defendants' first set of Interrogatories to the DPPs
6. The defendants' first set of RFPs to the Winn-Dixie DAPs

Once the New DAPs confirm that they will abide by the Protective Order, I can start sending you Smithfield's discovery responses and the search terms that Smithfield used when searching its documents.

Best regards,

Brian

Brian E. Robison

GIBSON DUNN

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From: Matthew McCahill
To: [Strang, Lindsey; elifvendahl@lgcounsel.com](#); [Ryan Manion; sgant@bsflp.com](#); [Michael Mitchell](#); [Robert Kaplan](#); [Jason A. Uris; charrison@bsflp.com](#); [Richard Coffman](#); [David B. Esau](#); [Kristin A. Gore](#); [Garth Yearick](#); [Eddy, David C.](#); [Lynch, Dennis J.](#); [Wheeler, Travis](#); [ckeibler@nexsenpruet.com](#)
Cc: [Rider, Tiffany](#); [Taylor, Jarod G.](#); [Oppenheimer, Brooke J.](#); [brobison@gibsondunn.com](#); [Samels, Max](#); [Duncan, Richard A.](#); [samirashid@quinnmanuel.com](#); [Heather Christenson](#); [peter.schwingler@stinson.com](#); [Smith, Chris](#)
Subject: RE: In re Pork - Production of Defendant Discovery Materials
Date: Thursday, August 5, 2021 9:16:41 AM
Attachments: [image001.png](#)

Caution: External Email

Lindsay,

You can send the materials to my colleague Mandrika Moonsammy: mmoonsammy@kaplanfox.com
We will get back to you on the service list.

Thanks,

Matt

From: Strang, Lindsey

Sent: Thursday, August 5, 2021 9:09 AM

To: [elifvendahl@lgcounsel.com](#); [Ryan Manion](#) ; [sgant@bsflp.com](#); [Michael Mitchell](#) ; [Robert Kaplan](#) ; [Matthew McCahill](#) ; [Jason A. Uris](#) ; [charrison@bsflp.com](#); [Richard Coffman](#) ; [David B. Esau](#) ; [Kristin A. Gore](#) ; [Garth Yearick](#) ; [Eddy, David C.](#) ; [Lynch, Dennis J.](#) ; [Wheeler, Travis](#) ; [ckeibler@nexsenpruet.com](#)

Cc: [Rider, Tiffany](#) ; [Taylor, Jarod G.](#) ; [Oppenheimer, Brooke J.](#) ; [brobison@gibsondunn.com](#); [Samels, Max](#) ; [Duncan, Richard A.](#) ; [samirashid@quinnmanuel.com](#); [Heather Christenson](#) ; [peter.schwingler@stinson.com](#); [Smith, Chris](#)

Subject: In re Pork - Production of Defendant Discovery Materials

Dear Counsel,

As you are aware, we are in the process of gathering discovery correspondence and previous document and data productions to send to the MDL DAPs. Would the MDL DAPs be amenable to designating one person to receive these materials on behalf of all the MDL DAPs? Given that some Defendants have produced dozens of production volumes, it would save considerable time and expense for Defendants to produce the materials to just one (or a few) designated individuals rather than generating file share access information for each MDL DAP. Please also let us know if there is one addressee and physical address to which Defendants can send hard drives.

Relatedly, would the DAPs please send us a service list listing all MDL DAP counsel that should be served with any papers? Attached is the most recent service list for Defendants.

Thanks,

Lindsey Strang

Associate



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